

1 ANDREW D. HEROLD, ESQ.
Nevada Bar No. 7378
2 NICHOLAS B. SALERNO, ESQ.
Nevada Bar No. 6118
3 HEROLD & SAGER
4 3960 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
5 Telephone: (702) 990-3624
Facsimile: (702) 990-3835
6 aherold@heroldsagerlaw.com
7 nsalerno@heroldsagerlaw.com

8 Attorneys for Defendant LEXINGTON INSURANCE COMPANY

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 HARTFORD FIRE INSURANCE
COMPANY, a Connecticut corporation,

12
13 Plaintiff,

14 vs.

15 LEXINGTON INSURANCE COMPANY, a
Delaware corporation,

16
17 Defendants.

CASE NO. 3:18-cv-0432-RCJ-WGC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR RESPONSE
TO HARTFORD FIRE INSURANCE
COMPANY'S FIRST AMENDED
COMPLAINT**

(FIRST REQUEST)

18 Defendant Lexington Insurance Company ("Lexington") and Plaintiff Hartford Fire
19 Insurance Company ("Hartford"), by and through their undersigned counsel, hereby submit the
20 following stipulation:

21 WHEREAS, on November 28, 2018, Hartford stipulated with Lexington to amend its
22 complaint with various details requested by Lexington (ECF No. 15);

23 WHEREAS, on December 14, 2018, Hartford filed its First Amended Complaint, which was
24 electronically served on Lexington (ECF Doc. No. 18);

25 WHEREAS, pursuant to FRCP 15(a)(3), Lexington's response to the First Amended
26 Complaint is due on or before December 28, 2018;

27 WHEREAS, Lexington requests additional time so that it may more thoroughly investigate
28 the new allegations within the First Amended Complaint and research the current state of the law

1 bearing on those new allegations.

2 WHEREAS, in light of the holidays, Hartford and Lexington have further stipulated that
3 Lexington be granted an additional 14 days to respond to Hartford's amended complaint;

4 WHEREAS, the Court has not granted any previous extensions to respond to the First
5 Amended Complaint.

6 IT IS HEREBY STIPULATED by and between Hartford and Lexington that the deadline
7 for Lexington to respond to Hartford's First Amended Complaint is extended to January 11, 2018.

8 DATED: December 18, 2018

HEROLD & SAGER

9 By: /s/ Nicholas B. Salerno

10 ANDREW D. HEROLD (SBN 7378)

NICHOLAS B. SALERNO, (SBN 6118)

11 aherold@heroldsagerlaw.com

nsalerno@heroldsagerlaw.com

12 Counsel for LEXINGTON INSURANCE
13 COMPANY

14 DATED: December 18, 2018

LAXALT & NOMURA, LTD.

15 By: /s/ Holly S. Parker

16 HOLLY S PARKER (SBN 10181)

RYAN W. LEARY (SBN 11630)

9790 Gateway Drive, Suite 200

17 Reno, Nevada 89521

Telephone: (775) 322-1170

18 Facsimile: (775) 322-1865

hparker@laxalt-nomura.com

19 rleary@laxalt-nomura.com

20 KRAMON & GRAHAM, P.A.

Susan M. Hogan (pro hac vice)

21 Beth P. Evans (pro hac vice)

One South Street, Suite 2600

22 Baltimore, Maryland 21202

Telephone: (410) 752-6030

23 Facsimile: (410) 361-8211

Email: shogan@kg-law.com

24 Email: bevans@kg-law.com

Counsel for Hartford Fire Insurance Company

25 **IT IS SO ORDERED.**

26 DATED: December 19, 2018.

William G. Cobb

27 UNITED STATES MAGISTRATE JUDGE